

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANNABELLE SUAREZ,

Plaintiff,

-against-

NEW YORK COUNTY DISTRICT ATTORNEY'S
OFFICE, NITIN SAVUR, NICOLE ORTSMAN-
DAUER, GEORGE ARGYROS, and INA CHEN,

Defendants.
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**DECLARATION OF
ERNST BONAPARTE IN
SUPPORT OF
DEFENDANTS' MOTION
TO DISMISS THE
COMPLAINT**

1:22-cv-10855(PGG)

ERNST BONAPARTE, declares, pursuant to 28 U.S.C. § 1746 and subject to the penalties of perjury, that the following is true and correct:

1. I am an Assistant Corporation Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendants in the above-captioned action. I am familiar with the facts set forth herein. I respectfully submit this declaration in support of Defendants' motion to dismiss the Complaint (Dkt. 1). This declaration is based on personal knowledge and a review of the files maintained by this office.

2. Attached hereto as Exhibit A is a copy of Plaintiff's charge of discrimination filed with the New York State Division of Human Rights ("SDHR") in or around March 2021, as amended in or around September 2021.

3. Attached hereto as Exhibit B is a copy of the SDHR's determination letter rendered on or about July 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
July 26, 2023

/s/

ERNST BONAPARTE
Assistant Corporation Counsel